

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JASON CORY BYCROFT and  
HEATHER NICOLE BYCROFT,

*Defendants.*

### CRIMINAL COMPLAINT

Case No. 21-MJ-374-SPS

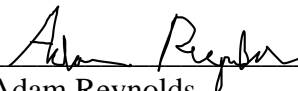
I, Adam Reynolds, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

Beginning on or about July 4, 2015, in the Eastern District of Oklahoma, **JASON CORY BYCROFT and HEATHER NICOLE BYCROFT** committed the crimes of Production of Child Pornography, in violation of Title 18, United States Code, Section 2252.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Special Agent Adam Reynolds, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



Adam Reynolds  
Special Agent  
Federal Bureau of Investigation  
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: September 22, 2021

STEVEN P. SHREDER  
UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Adam Reynolds, being duly sworn, depose and state that:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), I have been so employed since August 2009 and I am currently assigned to the FBI Oklahoma City Division, Muskogee Resident Agency. I am presently assigned to work primarily Indian Country criminal investigations in the Eastern District of Oklahoma. During my career as an FBI Agent, I have investigated numerous Indian Country crimes to include a variety of violent crimes. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 United States Code, Sections 2252.

2. As a Federal Agent, I am authorized by the Attorney General to investigate violations of the laws of the United States, and to request and execute warrants issued under the authority of the United States.

3. The statements contained in this Affidavit are based in part on information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, independent investigation, and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that Jason Cory Bycroft and Heather Nicole Bycroft, committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

**PROBABLE CAUSE**

4. VENUE: the facts and circumstances alleged in this affidavit occurred within the Eastern District of Oklahoma. More specifically, 33854 E 714 Rd, in the Whitehorn Cove area of Wagoner, Wagoner County which is within the geographic boundaries of the **Cherokee Nation Reservation**, and therefore is within Indian Country.

5. Detective Sergeant Ian Buchanan with Broken Arrow Police is a member of the Internet Crimes against Children (ICAC) task force and routinely gets leads from the National Center for Missing and Exploited Children (NCMEC) regarding child pornography. On August 5, 2021, Detective Sergeant Buchanan received a specific tip indicating that child pornography was observed trafficked to a Dropbox account belonging to an unknown individual using the email of jcbycroft@hotmail.com and user ID of Jason Bycroft. The video that was reported to NCMEC was an approximately twenty-four-minute video, containing an unknown prepubescent female. During the video the unknown female takes off her clothing and masturbates.

6. A search warrant was prepared by Detective Sergeant Buchanan through Tulsa District Court for the suspect's "Dropbox" account. Once the search warrant was signed and served to "Dropbox" a search took place of its contents on or about September 7, 2021. Detective Sergeant Buchanan observed images of the defendant as well as images of his spouse, contained in the defendant's "Dropbox". A copy of the original trafficked twenty-four-minute file was observed along with other content consistent with Child pornography, specifically juvenile females engaging in sexually explicit behavior.

7. While reviewing the Dropbox contents Detective Sergeant Buchanan also observed three videos containing the defendant in a pool with a prepubescent female. Detective Sergeant Buchanan interviewed Jason Bycroft in person and was able to recognize him as the same individual in the videos. During these videos, Jason Bycroft is exposing and attempting to expose the prepubescent female's vagina to a recording device. Buchanan further describes

the video as, “The manipulation of the juvenile’s shorts is overt, intentional, and not an accident. This is evidenced by the defendant attempting to capture this numerous times over the three videos.” The recording device is being held by a female and the defendant asks the camera person if they are “ready”, before exposing the victim’s vagina to the camera. This video was identified as being captured on July 4, 2015 using the “properties” information in the file.

8. Detective Sergeant Buchanan developed information that the victim in this case, identified as K.J. was six years old when the video was produced. K.J. was identified by showing the video of the girl in the above ground pool with Jason Bycroft to K.J.’s parents. K.J.’s parents were present at 33854 E. 714<sup>th</sup> Rd. in Wagoner County on July 4<sup>th</sup>, 2015 because they attended a party at that house with their daughter K.J.

9. On or about September 15, 2021, DA Investigator Stephanie Stephens went to 33854 E. 714<sup>th</sup> Rd. in Wagoner County and met with Gerald and Theresa Bycroft. They were shown the videos in question, and they believed the juvenile female in the video was the granddaughter of a neighbor (previously identified as K.J.). Theresa and Gerald identified Jason Bycroft as the adult male in the video, and both stated that they believed the female talking in the video was Heather Bycroft based on her voice and Heather Bycroft and Jason Bycroft would have been dating at that time. Theresa and Gerald stated that they hosted a fourth of July party at their house on July 4, 2015. While at the residence Inv. Stephens verified that the pool in the video is located in the backyard at the Bycroft’s home in Wagoner.

10. On September 17, 2021, Detective Sergeant Buchanan met with Courtney Bycroft. Courtney is the sister of Jason and was at the 4<sup>th</sup> of July party. After Courtney was allowed to see and hear the video, Courtney stated that the female voice of the camera operator was Heather Bycroft. Courtney stated she has known Heather for at least six years and recognizes her voice.

11. On September 21, 2021, Special Agent (SA) Adam Reynolds met with DA

Investigator Stephanie Stephens, who provided SA Reynolds with copies of reports and a copy of the Dropbox provided files. On the same day SA Reynolds conducted a review of the files and notice the following items of interest.

12. SA Reynolds observed four videos that based on the title of the files were created on July 4, 2015, that show Jason Bycroft throwing little girls in an above ground pool. The first video appears to be a juvenile female that is not K.J. but no sexual touching is noticed. However, SA Reynolds did find during his review of the Dropbox files a close up picture of this juvenile child's genital area in the same swimsuit while being held by Jason. The child's genital area was not exposed, but the picture was clearly focused on her genital area.

13. SA Reynolds then reviewed a second video which shows a juvenile female (previously identified as K.J.) with black hair, white shirt, black shorts. Jason Bycroft is holding her in his arms in the pool. The camera is being operated by someone standing outside of the pool. The camera operator does speak to Jason Bycroft during this video and based on the voice SA Reynolds believes the operator to be a female. Jason asks the camera operator if she is ready and the camera operator replies "Yea". Jason then brings the girl out of the pool and the camera is focused on the genital area of the child. You can then see Jason using his hands to try and move K.J.'s shorts and underwear to the side in what appears to be an attempt to expose her vagina to the camera. Jason tries this multiple times in quick succession but was unsuccessful and then throws K.J. back in the water. Before Jason throws K.J. back in the water the camera operator speaks again about where to throw K.J. in the pool. These responses from the female camera operator are what the prior witnesses identified as being the voice of Heather Bycroft and as such SA Reynolds believes the camera operator on all the videos to be Heather Bycroft.

14. SA Reynolds then reviewed the third video, in which it shows Jason picking up K.J. out of the pool while the girl is floating in a tube. The camera is again clearly focused on the girl's

genital/buttocks area, but nothing is exposed. The camera operator does not speak, but the camera appears to be in the same location as before.

15. SA Reynolds then reviewed the fourth video, in this video Jason picks up K.J. out of the pool facing the camera and this time he successfully using his hand pulls back her shorts and underwear (in the same manner as was being attempted in video 3). This exposes the girl's vagina directly to the camera. The camera is clearly focused on the girl's vagina. It is very clear that Jason is purposely pulling back the underwear and shorts and facing K.J. in a manner that gives the camera an angle to see what he is doing. The camera operator does say "Uh huh", in this video. The voice is the same female voice from the other videos, and it is said in a manner and during the part of the video where K.J.'s vagina is exposed, and the camera is focused. The video focuses in on the vagina and ends before the girl is placed back in the water.

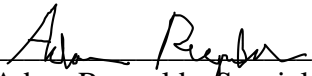
16. During the course of SA Reynolds review of the Dropbox files, SA Reynolds observed multiple other images of child pornography of currently unidentified children.

17. During the course of SA Reynolds' review of the Dropbox files, SA Reynolds located numerous videos where Heather Bycroft is utilizing a camera device to surreptitiously record up women skirts inside of business establishments. SA Reynolds is unsure of the device used, but Heather often catches her face in the camera on these videos. Heather also often catches Jason Bycroft's face in these videos.


18. Heather Bycroft is employed as a first-grade teacher at Bixby East Elementary School.

19. Based on a review of this case and based on my knowledge and experience with Production of Child Pornography, I, as your Affiant have probable cause to believe Jason Bycroft and Heather Bycroft had committed the offense of Production of Child Pornography in violation of Title 18, United States Code, Sections 2252.

Respectfully Submitted,

  
Adam Reynolds, Special Agent  
Federal Bureau of Investigation

Sworn before me this 22nd day of September 2021.

  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF OKLAHOMA